

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DONG VAN NGUYEN,

Petitioner,

v.

PATRICIA HYDE, Acting Director of the Boston Field Office, U.S. Immigration and Customs Enforcement; TODD LYONS, Acting Director of the U.S. Immigration and Customs Enforcement; KRISTI NOEM, Secretary of the U.S. Department of Homeland Security; and PAMELA BONDI, Attorney General of the United States, in their official capacities,

Respondents.

Civil Action No. 25-cv-11470-MJJ

**NOTICE OF SUPPLEMENTAL AUTHORITIES**

Pursuant to this Court's Order dated June 17, 2025 (Doc. 20), Respondents respectfully submit the following information:

1. Supplemental Declaration of Keith M. Chan, attached here as **Exhibit 1**; and
2. Memorandum of Understanding Between the Department of Homeland Security of the United States of America and the Ministry of Public Security of the Socialist Republic of Vietnam on the Acceptance of the Return of Vietnamese Citizens Who Arrived in the United States Before July 12, 1995 and who have been Ordered Removed from the United States, attached here as **Exhibit 2**.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

By: /s/ Nicole M. O'Connor  
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Date: June 18, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to any non-registered participants via first class mail.

/s/ Nicole M. O'Connor  
NICOLE M. O'CONNOR  
Assistant U.S. Attorney

Dated: June 18, 2025